

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**MONICA HAGUE,**

**Plaintiff,**

**VS.**

**UNIVERSITY OF TEXAS HEALTH  
SCIENCE CENTER AT SAN ANTONIO,**

**Defendant.**

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**CIVIL ACTION NO.  
SA-11-CA-1101-OG**

**STATEMENT OF PLAINTIFF'S CLAIMS TO BE USED  
IN CONDUCTING VOIR DIRE**

TO THE HONORABLE ORLANDO GARCIA, UNITED STATES DISTRICT JUDGE:

Pursuant to Local Court Rule CV-16 (e) (2), Plaintiff Monica Hague submits the following:

Monica Hague, a Registered Nurse, was employed by the University of Texas Health Science Center at San Antonio as a Clinical Instructor to train paramedics for the San Antonio Fire Department. Ms. Hague was employed under yearly contracts, the first beginning December 2008, with renewals in September 2009 and September 2010. Instead of being given a fourth contract, Ms. Hague was not renewed for employment six months after her complaint of sexual harassment resulted in a finding against her Medical Director of sexual misconduct in violation of UTHSCSA's Sexual Harassment, Sexual Misconduct Policy.

Prior to raising the complaint of sexual harassment, UTHSCSA had never expressed any concerns with Ms. Hague's performance. After the complaint of sexual harassment, Ms. Hague's employment was ended, together with the employment of three other women who provided support of Ms. Hague's claims during the investigation of the sexual harassment complaint.

Respectfully submitted,

LAW OFFICES OF  
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By: **/s/ Malinda A. Gaul**  
MALINDA A. GAUL  
Attorney for Plaintiff  
Texas State Bar No. 08239800

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of September, 2015, I electronically filed the above and foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to:

Frank A. King  
Assistant Attorney General  
Texas Attorney General's Office  
General Litigation Division  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548

**/s/ Malinda A. Gaul**  
MALINDA A. GAUL